

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN RE: NATIONAL PRESCRIPTION,
OPIATE LITIGATION

MDL NO. 2804

Case No. 17-MD-2804

THIS DOCUMENT RELATES
TO:

Judge Dan Aaron Polster

Rees v. McKesson Corporation, et al.
MDL Case #1:18-OP-45252;

Wood v. Purdue Pharma L.P., et al.
MDL Case #1:18-OP-45264;

Salmons v. Purdue Pharma L.P., et al.
MDL Case #1:18-OP-45268;

Ambrosio v. Purdue Pharma L.P., et al.
MDL Case #1:18-OP-45375;

Flanagan v. Purdue Pharma L.P., et al.
MDL Case #1:18-OP-45405;

Whitley v. Purdue Pharma LP., et al.
MDL Case #1:18-OP-45598;

Roach v. McKesson Corporation, et al.
MDL Case No. #1:18-OP-45662;

Hunt v. Purdue Pharma L.P., et al.
MDL Case No. #1:18-OP-45681;

Hanlon v. Purdue Pharma L.P., et al.
MDL Case No. #1:19-op-45052;

Doyle v. Purdue Pharma L.P., et al.
MDL Case No. #1:18-op-46327;

Moore v. Purdue Pharma L.P., et al.
MDL Case No. #1:18-op-46305;

Artz v. Purdue Pharma, L.P., et al.
MDL Case No. #1:19-op-45459;

Rodriguez v. Purdue Pharma, L.P., et al.
MDL Case No. #1:19-op-45463;

Ellis v. Purdue Pharma, L.P., et al.
MDL Case No. #1:19-op-45464;

DeMaro v. Purdue Pharma, L.P., et al.
MDL Case No. #1:19-op-45465;

Cruz v. Purdue Pharma, L.P., et al.
MDL Case No. #1:19-op-45466;

Paul v. Purdue Pharma, L.P., et al.
MDL Case No. #1:19-op-45467;

Lechuga v. Purdue Pharma, L.P., et al.
MDL Case No. #1:19-op-45468;

Brumbarger v. Purdue Pharma, LP., et al.
MDL Case No. #1:19-op-45469;

Means v. Purdue Pharma, L.P., et al.
MDL Case No. #1:19-op-45470;

Peterson v. Purdue Pharma, L.P., et al.
MDL Case No. #1:19-op-45472;

Hampel v. Purdue Pharma, L.P., et al.
MDL Case No. #1:19-op-45473;

Whittaker v. Purdue Pharma, L.P., et al.
MDL Case No. #1:19-op-45475;

Tuttle v. Purdue Pharma, L.P., et al.
MDL Case No. #1:19-op-45476;

Hamanni v. Purdue Pharma, L.P., et al.
MDL Case No. #1:19-op-45477;

Gauthier v. Purdue Pharma, L.P., et al.
MDL Case No. #1:19-op-45478;

Simonson v. Purdue Pharma, L.P., et al.
MDL Case No. #1:19-op-45479;

Delancey v. Purdue Pharma, L.P., et al.
MDL Case No. #1:19-op-45480;

Stewart v. Purdue Pharma, L.P., et al.
MDL Case No. #1:19-op-45481;

Shenmake v. Purdue Pharma, L.P., et al.
MDL Case No. #1:19-op-45482;

Weatherwax v. Purdue Pharma, LP., et al.
MDL Case No. #1:19-op-45483;

Martinez v. Purdue Pharma, L.P., et al.
MDL Case No. #1:19-op-45484;

Warren v. Purdue Pharma, L.P., et al.
MDL Case No. #1:19-op-45486;

Carlson v. Purdue Pharma, L.P., et al.
MDL Case No. #1:19-op-45487;

Flach v. Purdue Pharma, L.P., et al.
MDL Case No. #1:19-op-45488;

Ivie v. Purdue Pharma, L.P., et al.
MDL Case No. #1:19-op-45489;

Cherry v. Purdue Pharma, L.P., et al.
MDL Case No. #1:19-op-45490;

Ortiz v. Purdue Pharma, L.P., et al.
MDL Case No. #1:19-op-45492;

Meinecke v. Purdue Pharma, L.P., et al.
MDL Case No. #1:19-op-45493;

Brant v. Purdue Pharma, L.P., et al.
MDL Case No. #1:19-op-45494;

Williams, v. Purdue Pharma, L.P., et al.
MDL Case No. #1:19-op-45485;

MOTION FOR EXTENSION OF TIME

Pursuant to Federal Rule of Civil Procedure 6(b)(1)(a), Counsel for NAS Plaintiffs in the above-captioned cases respectfully request **a one week** extension of time to file a Motion to Compel pursuant to the Court's scheduling order dated October 7, 2019. (Doc. # 2738.) Plaintiffs timely served their requests for written discovery upon Defendants on October 15, 2019. Pursuant to the Court's scheduling order, a Motion to Compel must be filed by 12:00 PM today, "if the parties cannot agree as to whether the served discovery is appropriate". Yesterday, Defendants advised Plaintiffs of their objections to Plaintiffs' discovery requests, and Counsel for NAS Plaintiffs have scheduled a call for late this afternoon to meet and confer regarding the requests and objections.

A court may grant an extension of time for good cause shown, upon motion filed before the time has expired. Fed. R. Civ. P. 6(b)(1)(a). An extension of time is necessary in order for the parties to meet and confer regarding the discovery requests and objections, and attempt to reach an agreement. If an agreement can be reached, a Motion to Compel may be unnecessary. Counsel for NAS Plaintiffs have consulted with Counsel for Defendants prior to the filing of this motion.

In sum, NAS Plaintiffs respectfully request that for good cause shown, this Court grant NAS Plaintiffs an additional week to file a Motion to Compel, should it be necessary, after the parties meet and confer regarding the requests and objections.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing was filed via the Court's electronic filing system CM/ECF on this 25th day of October, 2019. Notice of this filing shall be sent via the Court's CM/ECF email notification system to all Counsel of record.

/s/ Marc E. Dann

Marc E. Dann

The Dann Law Firm Co., LPA